IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY VICINAGE OF TRENTON

ANYCLO INTERNATIONAL INC., a corporation,

Civil Action

Case No. 3:18-CV-05759-PGS-LHG

Plaintiff,

VS.

YANG-SUP CHA, an individual, NAM-HEE KIM, an individual, STAFFORD CHA, an individual, ANYCLO USA, INC., a corporation, MOJO MOTO, LLC, a corporation, JOHN DOES (1-20), JANE DOES (1-20) and ABC CORPORATIONS (1-10),

Defendants.

PLAINTIFF'S NOTICE OF MOTION TO AMEND JUDGMENT PURSUANT TO F.R.C.P. 59

Document Electronically Filed.

Motion Day: April 15, 2024

TO: Sukjin Henry Cho, Esq., 2160 North Central Road, Suite 305, Fort Lee, NJ 07024

PLEASE TAKE NOTICE that, on April 15, 2024, or as may be otherwise fixed by the Court, Plaintiff Anyclo International Inc. will move before the United States District Court for the District of New Jersey for an Order granting Plaintiff's Motion to Amend Judgment and increasing the amount of the Judgment entered by the Court on February 15, 2024 against Defendants in favor of Plaintiff by \$97,286.46 to account for the August 2, 2018 deposit into Defendant Anyclo USA, Inc.'s Bank of America account by Jacques Moret, Inc.

In support of this motion, Plaintiff shall rely upon the Memorandum of Law and Certification of Dong Geun Song submitted herewith, and a proposed form of Order accompanies this Motion.

By: s/Gregory J. Cannon
Gregory J. Cannon, Esq.
SOBEL HAN, LLP
105 Reids Hill Road, Suite B
Aberdeen, New Jersey 07747
(201) 603-3697
gcannon@sobelhan.com

DATED: March 14, 2024